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10 || Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

VIVIAN FIORI ARIZA, ROGGIE TRUJILLO, PAMELA NEWPORT, ROBERT DEAN, AND RAUL REYES, on behalf of themselves and all others similarly situated.

Plaintiffs,

V.

19 DELL INC., a corporation; BANCTEC, INC.,
20 a corporation; WORLDWIDE
21 TECHSERVICES, LLC, an entity; DELL
22 CATALOG SALES, L.P., an entity; DELL
23 PRODUCTS, L.P., an entity; DELL
24 MARKETING L.P., an entity; DELL
MARKETING L.P., LLC, an entity; DELL
MARKETING G.P., LLC, an entity; DELL
USA, L.P., an entity; and DOES 1 Through
10,

Defendants.

Case No. C09 01518 JW

**DECLARATION OF RANDALL S.
ROTHSCHILD IN SUPPORT OF
PLAINTIFFS' CONSOLIDATED
RESPONSE TO OBJECTIONS TO
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
REQUEST FOR ATTORNEYS' FEES**

CLASS ACTION

Date: March 21, 2011
Time: 9:00 a.m.
Courtroom: 8

Assigned to the Honorable James Ware,
Courtroom 8

Action filed on April 7, 2009

1 I, Randall S. Rothschild, declare as follows:

2 1. I am an attorney licensed to practice in California since December, 1981 and am the
3 sole shareholder of Randall S. Rothschild, a Professional Corporation, co-Class Counsel appointed
4 by the Court on behalf of the Class in the Court's Preliminary Approval Order dated November 23,
5 2010. I am also co-counsel for plaintiffs Vivian Fiori Ariza and Roggie Trujillo in this action;
6 plaintiff Pamela Newport in Newport v. Dell Inc., et al., United States District Court for the District
7 of Arizona, Case No. 08-096; and plaintiffs Robert Dean and Raul Reyes in Alvarez, et al. v. Dell
8 Inc., et al., California Superior Court, Mendocino County, Case No. SCUK CVG 0492921.

9 2. I am familiar with the facts stated in this declaration. I make this declaration of
10 my own personal knowledge, and if called to testify, I could and would competently testify
11 hereto under oath.

12 3. Attached hereto as Exhibit A is a true and correct copy of the State Bar of
13 California's Attorney Profile for Joel Golden. Exhibit A was printed from
14 <http://www.calbar.ca.gov> on March 7, 2011.

15 4. Collectively attached hereto as Exhibit B are true and correct copies of pages I
16 printed on March 7, 2011 from <http://www.classobjection.com>, the website belonging to attorney
17 Charles D. Chalmers, who brings his objections in this action on behalf of Neil Scheiman.

18 5. The final three pages of Exhibit F of the Request for Judicial Notice in Support of
19 Plaintiffs' Consolidated Response to Objections, filed concurrently herewith, are true and correct
20 copies of search results from Pacer indicating actions in which Objector's counsel Darrell
21 Palmer has appeared in. These pages were printed from Pacer on February 28, 2011.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct. Executed this 7th day of March, 2011 at Los Angeles, California.
24

25 _____
26 /s/ Randall S. Rothschild
Randall S. Rothschild
27
28

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Gretchen Carpenter, attest that concurrence in the filing of this document has been obtained from Randall S. Rothschild.

By: /s/ Gretchen Carpenter
Gretchen Carpenter

EXHIBIT A

THE STATE BAR OF CALIFORNIA

Monday, March 7, 2011

ATTORNEY SEARCH

Joel Chalfen Golden - #47904

Current Status: Active

This member is active and may practice law in California.

See below for more details.

Profile Information

The following information is from the official records of The State Bar of California.

Bar Number:	47904		
Address:	2356 Moore St Ste 101 San Diego, CA 92110 Map it		
County:	San Diego	Phone Number:	(619) 294-7918
District:	District 9	Fax Number:	(619) 294-2120
Sections:	None	e-mail:	Not Available
		Undergraduate School:	Univ of Minnesota; Minneapolis MN
		Law School:	Univ of San Diego SOL; San Diego CA

Status History

Effective Date	Status Change
Present	Active
1/7/1971	Admitted to The State Bar of California

Explanation of member status

Actions Affecting Eligibility to Practice Law

Disciplinary and Related Actions

Overview of the attorney discipline system.

This member has no public record of discipline.

Administrative Actions

This member has no public record of administrative actions.

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EXHIBIT B



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Helping Judges Spot Class Action Abuse

Helping protect Class Members from sell-out settlements or excessive attorneys fees.

CONTACT US

We can only fight class action abuse if a class member engages us to examine and object to a proposed settlement. If you get a Notice, or know a class action that involves you is going to be settled, contact us as soon as you can. Email us at echalmers@classobjector.com or fax us at 801-382-2469. There is no cost to you. We get paid, if at all, when the Court decides we provided a benefit to the class.

Class action abuse is rampant. Excessive attorneys' fees and sell-out settlements, particularly of the coupon variety, come in every imaginable form. Judges are supposed to protect the class members, but they generally don't for several reasons. They don't have the time to look closely. The abuses are not visible on a quick review. Moreover, judges suffer from the general attitude that it only means a few cents to anyone class member, so why fuss over it? But if you look at the class members as one John or Jill Q. Public, they are being taken for hundreds of millions every year by these abuses.

You may read and hear about efforts to correct "class action abuse" but most of this is lobbying by business to limit their exposure to class actions. Class actions are a great tool to protect the public against business abuse. Unfortunately, business has found the way to turn this tool to their advantage. They are happy to buy off the class action attorneys' with a big fee so long as the settlement is pennies, or worthless coupons, on the dollar and the company is released from its liability.

YOU MUST STAND UP FOR YOURSELF. Contact us as soon as you get a notice that you are part of a class action. The earlier the better – so that we can do the needed investigation.

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ABOUT US

Classobjector.com is the project of Charles D. Chalmers. A 1971 graduate of Stanford Law School, he has handled the litigation of complex business disputes for over 30 years. He became interested in class action abuse in 1999 and now devotes his entire practice to this issue. He is admitted to the Supreme Court of the United States, numerous federal courts of appeal, and all courts in California.

